

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA <i>ex rel.</i>)	
BROOK JACKSON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 1:21-cv-00008-MJT
)	
VENTAVIA RESEARCH GROUP, LLC;)	
PFIZER INC.; ICON, PLC)	
)	
Defendants.)	
)	

JOINT MOTION REGARDING BRIEFING SCHEDULE

Defendants, Pfizer Inc. (“Pfizer”), Ventavia Research Group, LLC (“Ventavia”), and ICON, plc (“ICON”)¹ (collectively “Defendants”) and Relator Brook Jackson (“Relator”) respectfully move the Court for an order extending and unifying Defendants’ deadlines to answer or otherwise respond and setting a briefing schedule for Defendants’ forthcoming motions to dismiss Relator’s First Amended Complaint.

On February 10, 2022, the Court ordered that Relator’s Complaint be unsealed. (ECF 16). Relator then filed her First Amended Complaint on February 22, 2022. (ECF 17). Based on disparate dates of service, and various extensions of time granted by the Court, Defendants’ current deadlines to answer or otherwise respond to Relator’s First Amended Complaint are April 22, 2022, for Pfizer, April 26, 2022, for Ventavia, and May 6, 2022, for ICON. On April 8, 2022, ICON filed an unopposed motion to extend its deadline to June 6, 2022. Defendants intend to file motions to dismiss Relator’s First Amended Complaint for, among other reasons, failure to state a

¹ By joining this Motion, ICON does not waive, and specifically preserves, its rights to assert any and all defenses in this matter, including, but not limited to, lack of personal jurisdiction.

claim. The Parties believe that good cause exists to unify these deadlines so as to streamline the Court's consideration of the motions and Relator's opposition to the same. The Parties have conferred and agreed to the following proposed briefing schedule, which the Parties respectfully ask the Court to adopt:

Motions to Dismiss:	June 6, 2022
Opposition to Motions to Dismiss:	August 6, 2022
Replies in Support of Motions to Dismiss:	September 6, 2022

WHEREFORE, the Parties respectfully request that the Court grant this Joint Motion Regarding Briefing Schedule. A proposed order is attached.

Dated: April 15, 2022

Respectfully Submitted,

/s/ Lexis Anderson

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2022, a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5. As of this date, all counsel of record has consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A). Service was further made on Ventavia's counsel by e-mail as indicated below.

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